

1 THE HONORABLE JAMES L. ROBART
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7 UNITED STATES DISTRICT COURT
8 WESTERN DISTRICT OF WASHINGTON
9 AT SEATTLE

10 A.H. Lundberg Associates, Inc. and)
11 Lundberg, LLC,) Case No. 14-CV-01160-JLR
12 v.)
13 TSI, Inc.,)
14 Defendant.)

15 *JLR*

16 THIS MATTER having come before the Court on the parties' Stipulated Motion to
17 Redact Trial Transcripts and the Report of Dr. Martin filed on April 10, 2017, and the Court
18 having reviewed the pleadings and papers on file herein:

19 The Court HEREBY GRANTS the stipulated motion and ORDERS that the transcripts
20 and report be redacted as follows:
21

22 Transcript of Trial – Day 2 held on September 13, 2016

- 23 -Page 28, Line 22, the number before the word "double"
24 -Page 28, Line 23, the number after the word "Okay?"
25 -Page 28, Line 24, the number before the word "tubes"
26 -Page 29, Line 1, the number before the word "double"

27 [PROPOSED] STIPULATED ORDER GRANTING
MOTION TO REDACT TRIAL TRANSCRIPTS AND
MARTIN REPORT - 1

251608.0049/6886068.1

LANE POWELL PC
1420 FIFTH AVENUE, SUITE 4200
P.O. BOX 91302
SEATTLE, WA 98111-9402
206.223.7000 FAX: 206.223.7107

1 -Page 29, Line 9, the number after the words "built a" and the number after the words "up
2 with"

3 -Page 67, Line 16, the measurement between the words "these" and "tubes"

4 -Page 109, Line 13, the numbers at the beginning of the line before the period, the number
5 before the word "tubes," and the number at the end of the line after the word "They're"

6 -Page 109, Line 14, the measurement after the word "they're" and the numbers at the end
7 of the line after the words "so that's the"

8 -Page 116, Line 23, the numbers at the end of the line after the word "model"

9 -Page 116, Line 25, the number at the beginning of the line before the period, the
10 measurement between the words "we had" and "tubes," and the measurement at the end of the
11 line after the word "tubes"

12 -Page 117, Line 1, the number after the word "tubes"

13 -Page 117, Line 2, the measurement after the word "now"

14 -Page 119, Line 2, the number before the word "tubes"

15 -Page 120, Line 16, the measurement at the end of the line after the words "it says"

16 -Page 120, Line 20, the number before the words "wet ESP" and the number before the
17 word "tubes"

18
19 Transcript of Trial – Day 3 held on September 14, 2016

20 -Page 48, Line 12, the measurement after the word "like"

21 -Page 48, Line 13, the measurement after the word "like"

22 -Page 48, Line 14, the measurement after the words "bundles to"

23 -Page 48, Line 16, the measurement at the end of the line after the words "They were"

24 -Page 50, Line 1, the number before the word "tubes"

25 -Page 50, Line 4, the number before the word "tubes"

26 -Page 50, Line 10, the number before the word "double"

27 -Page 51, Line 24, the number before the word "double"

[PROPOSED] ORDER GRANTING STIPULATED
MOTION TO REDACT TRIAL TRANSCRIPTS - 2

- 1 -Page 52, Line 12, the measurement before the word "tube"
- 2 -Page 52, Line 13, the measurement at the beginning of the line before the word "tube"
- 3 -Page 52, Line 14, the measurement before the word "tube" and the measurement at the
4 end of the line after the word "It's"
- 5 -Page 52, Line 17, the measurement after the word "typically"
- 6 -Page 52, Line 19, the measurement before the words "this probe"
- 7 -Page 52, Line 24, the measurement and equipment specification after the word "this"
8 through the end of the line
- 9 -Page 55, Line 16, the number before the word "double"
- 10 -Page 78, Line 13, the measurement after the word "typically" and the measurement
11 before the word "long"
- 12 -Page 92, Line 14, the measurement at the beginning of the line before the words "in both
13 cases"
- 14 -Page 93, Line 16, the measurement after the words "this being"
- 15 -Page 96, Line 18, the measurement after the words "diameter is"
- 16 -Page 97, Line 5, all words between the words "as a" and "OD."
- 17 -Page 97, Line 7, the measurement before "The inside diameter"
- 18 -Page 97, Line 23, the last word in the line after the words "around -- the"
- 19 -Page 100, Line 8, the measurement after the word "spaced"
- 20 -Page 100, Line 9, the measurement after the word "spaced"
- 21 -Page 100, Line 13, the measurement after the words "span of"
- 22 -Page 100, Line 18, the number before the words "at the bottom"
- 23 -Page 100, Line 19, the number before the words "in the middle"
- 24 -Page 100, Line 20, the number before "on the top"
- 25 -Page 112, Line 16, the specification between "star has" and "is that right?"
- 26 -Page 112, Line 18, the specification between "star has" and "is that right?"
- 27

[PROPOSED] ORDER GRANTING STIPULATED
MOTION TO REDACT TRIAL TRANSCRIPTS - 3

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1 -Page 125, Line 5, the measurement at the beginning of the line before the word "tubs"
2 and the measurement at the end of the line after the word "represent"

3 -Page 125, Line 11, the measurement at the beginning of the line up to the words "in all
4 cases"

5 -Page 125, Line 13, the measurement at the end of the line after the word "centered"

6 -Page 125, Line 14, the first word of the line before the words "on center"

7 -Page 125, Line 21, the specification between the words "they used" and "or tubes"

8 -Page 128, Line 10, the measurement after the words "tubes, the"

9 -Page 128, Line 12, the specification between the words "was a" and "which is a" and
10 everything following "which is a"

11 -Page 128, Line 13, the number before the words "gas passages"

12 -Page 128, Line 14, the number before the word "gas"

13 -Page 128, Line 16, the specification after the words "referred to as a"

14 -Page 128, Line 18, the specification after the word "identifier"

15 -Page 129, Line 2, the specification after the words "talk about this"

16 -Page 129, Line 5, the specification after the words "identifier of"

17 -Page 129, Line 7, the specification after the words "10-foot long,"

18 -Page 129, Line 8, the specification at the beginning of the line up to the word
19 "Somebody"

20 -Page 143, Line 12, the number before the word "percent" at the beginning of the line and
21 at the end of the line

22 -Page 150, Line 12, the number before the word "percent"

23 -Page 154, Line 19, the number before the word "percent"

24 -Page 154, Line 25, the number before the word "percent"

25 -Page 155, Line 2, the number before the word "percent"

26 -Page 155, Line 5, the amount at the beginning of the line before the words "for that
27 project"

[PROPOSED] ORDER GRANTING STIPULATED
MOTION TO REDACT TRIAL TRANSCRIPTS - 4

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1 -Page 155, Line 13, the number before the word "percent"
2 -Page 155, Line 14, the amount at the beginning of the line before the words "and
3 multiplying"
4 -Page 158, Line 20, the number before the word "percent"
5 -Page 159, Line 24, the rest of the line after the words "or the"
6 -Page 161, Line 2, the number before the word "percent"
7 -Page 161, Line 3, the number before the word "percent"
8 -Page 161, Line 4, the number before the word "percent"
9 -Page 161, Line 5, the number before the word "percent"
10 -Page 161, Line 6, the number before the word "percent"
11 -Page 161, Line 7, the number before the word "percent"
12 -Page 162, Line 2, the number before the word "percent"
13 -Page 162, Line 4, the number before the word "percent"
14 -Page 162, Line 7, the number before the words "gives you"
15 -Page 162, Line 8, the number inbetween the words "the" and "And that's"
16 -Page 162, Line 18, the number before the word "percent"
17 -Page 162, Line 19, the number before the word "percent"
18 -Page 162, Line 21, the number before the word "percent"
19 -Page 162, Line 22, the number before the word "percent"
20 -Page 162, Line 24, the number before the word "already"
21 -Page 164, Line 7, the amount before the word "correct?"
22 -Page 165, Line 4, the amount after the words "If I take"
23 -Page 165, Line 7, the amount before the words "correct"
24 -Page 170, Line 17, the number before the word "percent"
25 -Page 170, Line 19, the number before the word "percent"
26 -Page 170, Line 24, the number before the word "percent"
27 -Page 170, Line 25, the number before the word "percent"

[PROPOSED] ORDER GRANTING STIPULATED
MOTION TO REDACT TRIAL TRANSCRIPTS - 5

- 1 -Page 184, Line 19, the number before the words "double-wide"
- 2 -Page 185, Line 11, the first number of the line before the words "double-wide"
- 3 -Page 189, Line 14, the number at the end of the line after the words "idea of a"
- 4 -Page 189, Line 19, the first number of the line before the words "was conceived"
- 5

6 Transcript of Trial – Day 4 held on September 19, 2016

- 7 -Page 9, Line 23, the specification at the end of the line after the words "It was a"
- 8 -Page 10, Line 2, the numbers/measurements before the words "tubes," "long," and
- 9 "tubes"
- 10 -Page 11, Line 8, the number before the words "tube system"
- 11 -Page 11, Line 20, the number before the words "Wet ESP"
- 12 -Page 11, Line 21, the specification between the words "with" and "tubes"
- 13 -Page 11, Line 24, the number after the words "asking for a" and the measurement at the
- 14 end of the line after the word "with"
- 15 -Page 73, Line 14, the measurement before the word "tubes" and the measurement before
- 16 the word "mast"
- 17 -Page 73, Line 15, the measurement before the word "pitch" and the measurement before
- 18 the word "tubes"
- 19 -Page 82, Line 17, the measurement before the word "dimension"
- 20 -Page 82, Line 18, the number at the end of the line after the words "it to"
- 21 -Page 82, Line 22, the specification after the words "in this case,"
- 22 -Page 82, Line 24, the specification at the beginning of the line before the words "So there
- 23 was" and the specification before the word "increment"
- 24 -Page 82, Line 25, the specification after the words "within that"
- 25 -Page 83, Line 1, the measurement before the word "wide"
- 26 -Page 83, line 3, the measurement before the word "wide"
- 27 -Page 83, Line 4, the measurement at the beginning of the line before the word "tall"

[PROPOSED] ORDER GRANTING STIPULATED
MOTION TO REDACT TRIAL TRANSCRIPTS - 6

- 1 -Page 83, Line 9, the measurement before the word "wide"
- 2 -Page 83, Line 10, the number at the beginning of the line before the word "tubes"
- 3 -Page 88, Line 4, the number before the words "Wet ESP"
- 4 -Page 89, Line 13, the measurement before the word "tubes"
- 5 -Page 89, Line 15, the measurement before the word "tubes"
- 6 -Page 89, Line 17, the measurement before the word "tubes"
- 7 -Page 89, Line 24, the number before the word "collection"
- 8 -Page 90, Line 2, the measurement before the word "tubes"
- 9 -Page 98, Line 10, the measurement before the word "wide"
- 10 -Page 98, Line 11, the measurement before the word "high"

11

12 Transcript of Trial – Day 5 held on September 20, 2016

- 13 -Page 6, Line 3, the specification after the word "down" through the end of the line
- 14 -Page 6, Line 4, the specification at the beginning of the line up to the word "It" and the
- 15 measurement between the words "say," and "tubes"
- 16 -Page 6, Line 6, the measurement before the word "tubes"
- 17 -Page 6, Line 10, the measurement before the word "tubes"
- 18 -Page 16, Line 7, the measurement before the words "do you see that?"
- 19 -Page 16, Line 8
- 20 -Page 16, Line 9, the measurement at the beginning of the line before the words "That
- 21 is"
- 22 -Page 16, Line 14, the measurement after the words "jury that"
- 23 -Page 31, Line 8, the number at the beginning of the line before the word "percent"
- 24 -Page 31, Line 9, the amount after the words "would be"
- 25 -Page 32, Line 3, the number at the beginning of the line before the words "If you
- 26 jump"
- 27 -Page 32, Line 4, the number after the word "percentage"

[PROPOSED] ORDER GRANTING STIPULATED
MOTION TO REDACT TRIAL TRANSCRIPTS - 7

1 -Page 32, Line 5, the number after the words "column, was" and the number after the
2 words "all in this"
3 -Page 33, Line 2, the numbers between the words "either the" and "but in"
4 -Page 33, Line 3, the numbers before the word "percent" (both times)
5 -Page 33, Line 4, the amount at the end of the line after the word "about"
6 -Page 80, Line 15, the number before the word "percent"
7 -Page 81, Line 1, the number before the word "percent"
8 -Page 133, Line 13, the number after the words "built a"
9 -Page 134, Lines 19-20 from after the words "where is says" up to the word "tubes"
10 -Page 137, Line 6, the number after the word "Pellets"
11 -Page 137, Line 12, the number after the word "Pellets"
12 -Page 138, Line 21, the number at the end of the line after the words "manufacture a"
13 -Page 139, Line 4, the number after the words "what the"
14 -Page 143, Line 24, the measurement before the word "tube"
15 -Page 144, Line 1, the measurement before the word "pitch"
16 -Page 161, Line 7, the measurement before the word "tubes"
17 -Page 162, Line 6, the number after the word "tubes,"
18
19 Transcript of Trial – Day 6 held on September 21, 2016
20 -Page 69, Line 24, the measurements between the words "either" and "did you?"
21 -Page 70, Line 22, the specifications between the words "testified to" and "You didn't"
22 -Page 71, Lines 3-4, the specifications between the words "decided to use" and "do you?"
23 -Page 71, Line 21-22, the measurements between the words "mast length" and "correct?"
24 -Page 71, Line 24, the measurements at the end of the line after the words "other than"
25 -Page 71, Line 25, the specifications at the end of line after the words "parameter is the"
26 -Page 72, Line 1, the measurement at the beginning of the line before the words "But I"
27 -Page 72, Line 14, the measurements before the word "correct"

[PROPOSED] ORDER GRANTING STIPULATED
MOTION TO REDACT TRIAL TRANSCRIPTS - 8

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- 1 -Page 73, Line 5, the measurement at the end of the line after the words "use a"
- 2 -Page 75, Line 14, the specification after the words "precipitator of"
- 3 -Page 75, Line 18, the specification after the word "configuration"
- 4 -Page 81, Line 4, the number before the words "is one version"

5

6 Transcript of Trial – Day 7 held on September 22, 2016

- 7 -Page 9, Line 20, the number at the beginning of the line before the word "percent"
- 8 -Page 22, Line 2, the number before the word "Wet"
- 9 -Page 22, Line 3, the measurement between the words "steel" and "wow"
- 10 -Page 22, Line 4, the specification between the words "Next slide" and "oh"
- 11 -Page 22, Line 9, the specification between the words "Electrodes with" and "Oh"
- 12 -Page 31, Line 4, the number before the word "tubes"
- 13 -Page 31, Line 5, the number before the word "tubes"
- 14 -Page 36, Line 9, the number before the word "percent"
- 15 -Page 36, Line 10, the number before the word "percent"
- 16 -Page 36, Line 11, the amount before the word "Okay?"
- 17 -Page 36, Line 13, the number before the word "percent"
- 18 -Page 36, Line 14, the number before the word "percent"
- 19 -Page 36, Line 15, the number before the word "percent" and the amount at the end of the
- 20 line
- 21 -Page 37, Line 3
- 22 -Page 37, Line 12, the number before the word "million"
- 23 -Page 37, Line 16, the amount after the words "put in"
- 24 -Page 38, Line 1, the amount before the words "yet"
- 25 -Page 62, Line 18, the measurements between the words "GIC" and "That's"
- 26 -Page 64, Line 23, the number before the word "design"
- 27 -Page 64, Line 24, the number before the word "design"

[PROPOSED] ORDER GRANTING STIPULATED
MOTION TO REDACT TRIAL TRANSCRIPTS - 9

- 1 -Page 65, Line 1, the number before the words "They had" and the number before the
2 words "Mr. Jaasund"
3 -Page 65, Line 3, the number at the beginning of the line before the words "Then he used"
4 -Page 65, Line 15, the measurement at the end of the line after the words "Markley get?"
5 -Page 65, Line 16, the measurement at the end of the line after the word "International"
6

7 Report of Technical Expert Dr. Martin

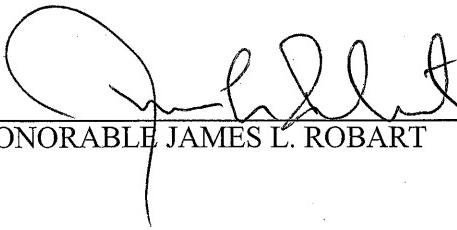
- 8 -PDF Page 14
9 -Spherical Washer Assembly
10 -redact entire section up to "Electrode Body"
11 -Electrode Body
12 -redact entire section up to "Disc"
13 -Disc
14 -redact entire section up to "Washer, Flat"
15 -redact footnote 15

- 16 -PDF Page 15
17 -redact up to "Disc spacing"
18 -Disc spacing
19 -redact entire section up to "Based on these comparisons..."
20 -redact the measurements each time before the word "bolts"
21 -redact the thread pitch and description for AHL and TSI

- 22 -PDF Pages 27-30
23 -redact text from Lundberg's Interrogatory No. 7

- 24 -PDF Page 33
25 -redact figure 6 (picture and text)

26 SO ORDERED this 23rd day of April, 2017.

27 
28 HONORABLE JAMES L. ROBART

[PROPOSED] ORDER GRANTING STIPULATED
MOTION TO REDACT TRIAL TRANSCRIPTS - 10

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P.O. BOX 91302
SEATTLE, WA 98111-9402
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1 CERTIFICATE OF SERVICE
2

3 I hereby certify under penalty of perjury of the state of Washington that on April 10, 2017,
4 I caused to be served a copy of the foregoing [PROPOSED] ORDER GRANTING
5 STIPULATED MOTION TO REDACT LIMITED EXCERPTS OF TRIAL TRANSCRIPTS
6 and THE REPORT OF DR. MARTIN, to the following persons in the manner indicated below
7 at the following addresses:

8 Mr. Kenneth W. Hart by CM/ECF
9 Ms. Emilia L. Sweeney by Electronic Mail
10 Carney Badley Spellman, P.S. by Facsimile Transmission
11 701 Fifth Avenue, Suite 3600 by First Class Mail
Seattle, WA 98104-7010 by Hand Delivery
Telephone: (206) 607-4174 by Overnight Delivery
Facsimile: (206) 467-8215
E-Mail: hart@carneylaw.com
sweeney@carneylaw.com
doyle@carneylaw.com
williams@carneylaw.com
weinberg@carneylaw.com

16
17 Dated this 10th day of April 2017.

18 *s/ Ann Gabu* _____
19 Ann Gabu, legal assistant
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26
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251608.0049/6913379.1

[PROPOSED] ORDER GRANTING STIPULATED
MOTION TO REDACT TRIAL TRANSCRIPTS - 11

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1420 FIFTH AVENUE, SUITE 4200
P.O. BOX 91302
SEATTLE, WA 98111-9402
206.223.7000 FAX: 206.223.7107